



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
 One Saint Andrew's Plaza
 New York, New York 10007*

April 28, 2020

BY ECF

The Honorable Lorna G. Schofield
 United States District Judge
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: United States v. Joseph Bagaglia, 19 Cr. 342 (LGS)

Dear Judge Schofield:

The Government respectfully submits this letter, with consent from defense counsel, requesting an adjournment of the status conference currently scheduled in this case for Thursday, April 30, 2020 at 11 a.m. The Government and the defendant are currently engaged in discussions regarding a pretrial disposition in this case, and those discussions have been delayed by the ongoing pandemic and will not be resolved by the next scheduled status conference date. Accordingly, the Government requests that the status conference be adjourned 60 days to allow the parties to continue their discussions. Furthermore, the Government, for the same reasons, moves, with consent from defense counsel, to exclude time under the Speedy Trial Act until the next scheduled status conference.

Application Granted. The status conference currently scheduled for April 30, 2020 is adjourned to June 30, 2020 at 11:00 a.m. For the reasons stated below, the Court finds that the ends of justice served by excluding the time between today and June 30, 2020 outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h) (7)(A). It is hereby ORDERED that the time between today and June 30, 2020 is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 29.

Dated: April 28, 2020
 New York, New York

Respectfully submitted,

GEOFFREY S. BERMAN
 United States Attorney

by: _____ /s/
 Ni Qian
 Assistant United States Attorney
 (212) 637-2364

LORNA G. SCHOFIELD
 UNITED STATES DISTRICT JUDGE